

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

U.S. District Courts  
Southern District of Texas  
FILED  
OCT 20 2014  
David J. Bradley, Clerk of Court

PRIMITIVO GONZALEZ et al.,  
Plaintiffs

v.

PROFESSIONAL FLOOR & JANITORIAL  
LLC, et al.,  
Defendants

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§

CIVIL ACTION NO.  
4:14-CV-02384

**DEFENDANTS' ANSWER**

Defendants PROFESSIONAL FLOOR & JANITORIAL, LLC and SHELBY BUILDING MAINTENANCE & JANITORIAL, INC. (hereafter collectively "Defendants") file their Answer in response to PLAINTIFFS' COMPLAINT.

**I. Admissions and Denials**

1. Defendants admit that Plaintiffs brought suit. Defendants deny that they "employed" Plaintiffs or failed to pay them for work they performed during their "employment." Defendants deny that they misclassified the Plaintiffs as Independent Contractors.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in this paragraph.

3. Admit.

4. Admit.

5. Admit.

6. Defendants deny that Bonnie Taylor is an officer & director of Defendants.

7. Admit.

8. Admit.

9. Deny.

10. Deny.

11. Deny.

12. Deny.

13. Deny.

14. Deny.

15. Deny.

16. Deny.

17. Deny.

18. Deny.

19. Deny.

20. Deny.

21. Deny.

22. Deny. Further, there is no time period specified in this paragraph.

23. Deny. Further, there is no time period specified in this paragraph.

24. Defendants deny that Plaintiffs were employees or that they controlled the terms and conditions of Plaintiffs' work.

25. Defendants deny that Plaintiffs were employees or that they controlled the terms and conditions of Plaintiffs' work.

26. Defendants deny that Plaintiffs were employees or that they controlled the terms and conditions of Plaintiffs' work. Defendants further deny that Bonnie Taylor is currently a director or officer of Defendants.

27. Defendants deny that Plaintiffs were employees or that they controlled the terms and conditions of Plaintiffs' work. Defendants further deny that Bonnie Taylor is currently a director or officer of Defendants.

28. Defendants are without knowledge or information sufficient to form a belief as to the truth of the statements in paragraph 28.

29. Deny. Defendants deny that Plaintiffs were employees.

30. Deny. Defendants deny that Plaintiffs were employees.

31. Defendants are without knowledge or information sufficient to form a belief as to the truth of the rest of the statements in this paragraph.

32. Defendants deny that Plaintiffs were employees. Defendants deny that they were required to pay overtime. Defendants deny that Plaintiffs were entitled to overtime pay based on the hours worked.

33. Deny. Defendants deny that Plaintiffs were employees.

34. Deny. Defendants deny that Plaintiffs were employees.

35. Deny.

36. Deny.

37. Deny. Defendants deny that Plaintiffs were employees.

38. Deny.

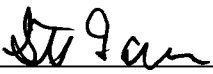
39. Deny. Defendants deny that Plaintiffs were employees.

40. Deny. Defendants deny that Plaintiffs are entitled to relief under the Fair Labor Standards Act.

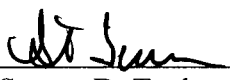
41. Deny. Defendants deny that Plaintiffs were employees.

42. Deny. Defendants deny that Plaintiffs are entitled to relief under the Fair Labor Standards Act.
43. Deny. Defendants deny that Plaintiffs were employees.
44. Deny. Defendants deny that Plaintiffs are entitled to relief under the Texas Minimum Wage Act.
45. Deny.
46. Deny.
47. Deny. Defendants deny that Plaintiffs are entitled to relief under the Fair Labor Standards Act.
48. Deny. Defendants deny that Plaintiffs are entitled to relief under the Texas Minimum Wage Act.
49. Defendants deny that Plaintiffs are entitled to attorney fees.
50. Deny.

SHELBY BUILDING MAINTENANCE & JANITORIAL SERVICE,  
INC.

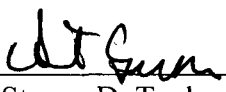
By:   
Steven D. Taylor, President

PROFESSIONAL FLOOR & JANITORIAL SERVICE, LLC

By:   
Steven D. Taylor, Manager

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was forwarded via facsimile 512-474-0008 to Christopher J. Willett on October 17, 2014.

By:   
Steven D. Taylor

To:

David J. Bradley  
Clerk of Court  
PO Box 61010  
Houston, TX 77208

United States Courts  
Southern District of Texas  
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Re: Civil Action No. 4:14-CV-02384

Please find enclosed the Answer for Defendants Professional Floor & Janitorial, LLC and Shelby Building Maintenance & Janitorial Service, Inc.

Thank you.

Steven D. Taylor  
PO Box 4530  
Bryan, TX 77805

Cc:

KayvonSabourian/Christopher J. Willett  
*Via fax* 512-474-0008

4813-8885-4047, v. 1